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13 UNITED STATES DISTRICT COURT
14 NORTHERN DISTRICT OF CALIFORNIA
15 SAN FRANCISCO DIVISION

16
17 UNITED STATES OF AMERICA,

) NO. CR 16-00227-SI

18 Plaintiff,

) UNITED STATES' MOTION TO UNSEAL AND
REQUEST FOR LEAVE TO FILE REDACTED
APPLICATION AND ORDER AUTHORIZING
TRAVEL RECORD PRODUCTION AND
ACCOUNT ACCESS; [PROPOSED] ORDER

19 v.

20 BTC-E, A/K/A CANTON BUSINESS
CORPORATION,

)

21 and

22 ALEXANDER VINNIK,

)

23 Defendants.

)

24
25
26 The United States of America ("the government"), through undersigned counsel, respectfully
moves this Court to unseal redacted copies of (1) an application of the United States for an order
27 authorizing travel record production and contemporaneous account access in matter No. CR-16-90391-
28

UNITED STATES' MOTION TO UNSEAL; [PROPOSED] ORDER
Case No. CR 16-00227-SI

v. 7/10/2018

1 MISC-EDL; and (2) the Court order granting that application. The government also requests leave to
2 file the redacted versions of those documents in the above-referenced action.

3 Those documents are currently under seal and no longer need to be sealed except for the
4 redactions in the proposed versions. The redactions are necessary because they include PII, government
5 personnel email addresses, and information about sensitive law enforcement techniques. Proposed
6 redacted versions of the application and order will be lodged under seal with the Court as Exhibits A and
7 B to this motion.

8 Respectfully submitted,

9 ISMAIL J. RAMSEY
10 United States Attorney

11 DATED: July 3, 2023

12 /s/
13 CLAUDIA QUIROZ
14 KATHERINE LLOYD-LOVETT
15 Assistant United States Attorneys
C. ALDEN PELKER
Trial Attorney, CCIPS Assistant United States
16 Attorney

17 **[PROPOSED] ORDER**

18 On the motion of the United States, and good cause appearing therefor, the Court grants the
19 government's motion and ORDERS that the government may file the application of the United States
20 for an order authorizing travel record production and contemporaneous account access and the Court
21 order granting that application in matter No. CR-16-90391-MISC-EDL with the redactions proposed in
22 Exhibits A and B to the government's motion.

23 IT IS SO ORDERED.

24 DATED: 7/3/2023

25 
26 HONORABLE SUSAN ILLSTON
United States District Judge